

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE SOUTH AFRICAN APARTHEID LITIGATION 02 MDL 1499 (SAS)

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This Document Relates to:

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LUNGISILE NTSEBEZA , *et al.*,  
Plaintiffs,  
-against-  
FORD MOTOR COMPANY and  
INTERNATIONAL BUSINESS  
MACHINES CORPORATION,  
Defendants. 02 Civ. 4712 (SAS)  
02 Civ. 6218 (SAS)  
02 Civ. 1024 (SAS)

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SAKWE BALINTULO, *et al.*,  
Plaintiffs,  
-against-  
FORD MOTOR COMPANY and  
INTERNATIONAL BUSINESS  
MACHINES CORPORATION,  
Defendants. 03 Civ. 4524 (SAS)

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**PLAINTIFFS' MOTION FOR LEAVE TO FILE AMENDED COMPLAINTS**

Plaintiffs *Balintulo* and *Ntsebeza*, by and through their attorneys, respectfully move the Court, pursuant to Rule 15(a) of the Federal Rules of Civil Procedure, for leave to file Amended Complaints. The Amended Complaints will add additional factual allegations against

Defendants to address significant changes in applicable law that have occurred since Plaintiffs' complaints were filed in 2008. For the reasons set forth in the attached Memorandum of Law, the Court should grant the instant Motion upon entry of the attached proposed Order.

Dated: May 30, 2014

Respectfully submitted,

/s/ Diane Sammons

Diane Sammons  
Nagel Rice, LLP  
103 Eisenhower Parkway  
Suite 101  
Roseland, NJ 07068  
(973) 618-0400  
Fax: (973) 618-9194  
Email: [dsammons@nagelrice.com](mailto:dsammons@nagelrice.com)

/s/ Michael D. Hausfeld

Michael D. Hausfeld  
Hausfeld LLP  
1700 K St. N.W. Suite 650  
Washington, D.C. 20006  
(202) 540-7200  
Email: [mhausfeld@hausfeldllp.com](mailto:mhausfeld@hausfeldllp.com)